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**From:** Sheppard, Tracy [Sheppard.Tracy@epa.gov]  
**Sent:** 5/4/2021 6:51:26 PM  
**To:** Grifo, Francesca [Grifo.Francesca@epa.gov]  
**Subject:** RE: Fluoridation, TSCA & Scientific Integrity

## Ex. 5 Attorney Client (AC)

Tracy L. Sheppard, Attorney-Advisor,  
US EPA, Office of General Counsel  
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Ex. 6 Personal Privacy (PP) mobile

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**From:** Grifo, Francesca <Grifo.Francesca@epa.gov>  
**Sent:** Tuesday, May 4, 2021 2:30 PM  
**To:** Sheppard, Tracy <Sheppard.Tracy@epa.gov>  
**Subject:** Fwd: Fluoridation, TSCA & Scientific Integrity

Hi there

### Ex. 5 Deliberative Process (DP)

Thanks!

Francesca

Francesca Grifo  
Scientific Integrity Official  
US EPA Office of Science Advisor, Policy & Engagement  
Office - 202-564-1687  
Mobile Ex. 6 Personal Privacy (PP)  
Office Hours Wednesdays 11:30 to 1:30

Begin forwarded message:

**From:** "Grifo, Francesca" <Grifo.Francesca@epa.gov>  
**Date:** April 30, 2021 at 11:04:08 AM EDT  
**To:** "Hawkins, Belinda" <Hawkins.Belinda@epa.gov>  
**Subject:** Fwd: Fluoridation, TSCA & Scientific Integrity

Thoughts on this one?  
F

Francesca Grifo  
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Begin forwarded message:

**From:** Karen Spencer <KFSpencer@comcast.net>  
**Date:** April 30, 2021 at 9:18:22 AM EDT  
**To:** "Grifo, Francesca" <Grifo.Francesca@epa.gov>  
**Subject:** Fluoridation, TSCA & Scientific Integrity

**"Science absolutely requires independence and integrity. Without them science ceases to be science. It becomes a tool to manipulate people."** - Dr. Allison Wilson, Co-founder & Science Director of the Bioscience Resource Project (2015)

**"The available data, responsibly interpreted, indicate little or no beneficial effect of water fluoridation on oral health."** - Dr. Kathleen Thiessen, 2006 National Research Council on "Fluoride in Drinking Water" and President of Oak Ridge Center For Risk Analysis (2011)

**"New evidence questions existing policies about the safety of fluoride for babies' developing brains. Given that safe alternatives are available and that there is no benefit of fluoride to babies' teeth before they erupt or appear, it is time to protect those who are most vulnerable."** - Bruce Lanphear MD, PhD; Christine Till PhD; & Linda S. Birnbaum PhD in *"It is time to protect kids' developing brains from fluoride."* Environmental Health News (October 7, 2020)

Dear Dr. Grifo,

Despite marketing campaigns to the contrary, fluoridation policy has never been proved safe. Moreover, the original assumption that systemic exposure was necessary to achieve cavity resistance has been scientifically proved to be false, and any dental benefit from consumption of fluoride in any amount is somewhere between negligible and imaginary.

- However, the fluoridation issue is not about teeth. It is about scientific integrity.

Nowhere has the evidence of decayed scientific integrity been more on display than in the ongoing TSCA trial against the EPA in the 9th District Court. Judge Edward M. Chen has kept the trial in abeyance since summer 2020 in order to allow the EPA time to do the right thing, but at every step of the way, the EPA has done everything in its power to obfuscate the facts of case.

In the trial proper, the EPA depended on hired 'white coats' instead of using its own scientists. Paying them \$350k, these individuals who typically testify on behalf of polluters in fighting the EPA agreed that several NIH sponsored studies that proved a dose-response effect of fluoride using the urine of pregnant women predicted a loss in IQ (and increased incidence of learning disabilities) in their offspring were the highest quality science we have. These studies are part of a larger collection of dozens of human studies and hundreds of laboratory studies spanning 25 years that find the same consistent neurotoxic developmental effect. The concentrations are consistent with 'optimally' fluoridated American communities and are consistent with at least two EPA studies (Mundy et al. 2009 and 2015). However, in a small voice, one of those hired guns said, "I don't believe it (the science)."

In April 2021, the Judge was not well pleased that the EPA failed to take advantage of the preceding months to re-examine the issue in light of the plaintiff's supplemental filing with the EPA of the latest studies and trial proceedings. The EPA's position was that they didn't think the case had legal standing because none of the original named plaintiffs in the case were pregnant or indicated they planned on becoming pregnant. Since the lawsuit was filed, one of the two member representatives for the Food & Water Watch, Jessica Trader, married and has become pregnant. (I am the other

member representative on that original filing.) Plaintiff counsel gathered a list of other Food & Water Watch members who are or plan on becoming pregnant.

The Judge accepted that amendment and supplemental pleading over the EPA's objection. The EPA attorneys argued that they need to examine the validity of those pregnant women and felt the change to the lawsuit was prejudicial because they focused on rejecting the lawsuit on legalese in the trial rather than the scientific merits (despite the \$350k they paid for outside testimony). The judge reassured EPA it would have a chance in Part 2 of the trial, at a date yet to be determined but I agree - the EPA has never wanted to examine the modern scientific issues associated with either fluoridation policy or their ridiculously high MCL/MCLG of 4 ppm fluoride in drinking water.

- The WHO and every other country has a MCL of 1.5 ppm and the 2006 NRC advised the EPA that 4 ppm was harmful to consumers and that there was no evidence of safety at any concentration for vulnerable sub-populations, who include pregnant women & their fetuses, bottle-fed babies & young children, the elderly, and any in fragile health i.e. thyroid & kidney patients (who are often advised by their doctors to not drink fluoridated water.)

Doctor Grifo, as you can well imagine from my signature, I could go on for much longer on this topic. However, I suggest it would be more effective if you read the link in the third quote above and the credentials of those authors, then do whatever is necessary to redirect the EPA to behave in a scientifically responsible manner regarding the citizens's petition that was the beginning of the TSCA lawsuit re fluoride in drinking water and recently updated with supplemental material at the direction of Judge Chen.

- Frankly, the MCLG for fluoride should be zero, just like with lead. If the MCL needs to be 1.5 ppm like in the rest of the world, so be it, but allowing any fluoride to be intentionally added to water supplies is scientifically unjustifiable.
  - Senior researcher, Dr. Christine Till, said, "4.5 points is a dramatic loss of IQ, comparable to what you'd see with lead exposure." Dr. David Bellinger, professor in the Department of Environmental Health at the Harvard School of Public Health, was asked by JAMA Pediatrics to write an editorial to accompany the study. He said, "It's actually very similar to the effect size that's seen with childhood exposure to lead." JAMA Pediatrics editor Dr. Dimitri Christakis and another JAMA editor, Dr. Frederick Rivara, agreed, saying it was, "An effect size which is sizeable – on par with lead." - on "Association Between Maternal Fluoride Exposure During Pregnancy and IQ Scores in Offspring in Canada" by Green et al. published in JAMA Pediatrics, August 19, 2019

Just know this, fluoridation policy poisons us **womb to tomb** and in the process pollutes the environment as less than 2% of the contaminated fluoridation chemicals sourced from industry waste product is consumed by people or animals, the remainder goes directly into the environment where it builds up, year after year, just like it does in our bones.

- "In this cohort of postmenopausal women, the risk of fractures was increased in association with two separate indicators of fluoride exposure. Our findings are consistent with RCTs and suggest that high consumption of drinking water with a fluoride concentration of ~1 mg/L may increase both BMD (bone mineral density) and skeletal fragility in older women." - Helte E, et al. Fluoride in Drinking Water, Diet, and Urine in Relation to Bone Mineral Density and Fracture Incidence in Postmenopausal Women. Environ Health Perspect. 2021 Apr;129(4):47005.

See attached annotated bibliography of some of the fluoride science published since 2015.

Regards,

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Karen Spencer  
Gloucester, MA  
978.283.4606  
Follow me on [Twitter](#)  
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See the [Call to Action](#)

*More power to you if fluoridation doesn't bother you, but not the power to assume it's safe for your neighbor with kidney disease, his pregnant wife or their diabetic daughter!*

**About Karen:** Currently a semi-retired consultant working with software development teams, Karen Spencer is a former analyst and project leader. She is adept at conducting research and analyzing trends. Her special interests include critical thinking, data-driven decision making, and organizational theory. She and others in her family are among the 15% of Americans with chemical sensitivities triggered by exposure to fluoridated food and drink. Karen's most recent publications were featured in:

Medical Hypotheses (2018): <https://www.sciencedirect.com/science/article/pii/S0306987718308600>

GreenMed (2019): <https://www.greenmedinfo.com/blog/wetoo-medical-assault-and-battery>